



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH/HDM/PP/MD
F. #2019R00927

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 22, 2021

By FedEx

Cesar DeCastro, Esq.
7 World Trade Center, 34th Floor
New York, NY 10007

**Re: United States v. Genaro Garcia Luna
 Criminal Docket No. 19-576 (BMC)**

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Please note that the enclosed discovery contains Protected Material that should be handled in accordance with the Protective Order. See Dkt. No. 19. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Enclosed please find:

- Financial Records, Bates-numbered 0001047652-0001047826; 0001048003-0001048063; 0001049116-0001049165; 0001049914-0001050323; 0001050332-0001051367; 000105294-0001061159;
- Property Records, Bates-numbered 0001047827-0001048002; 0001051368-0001052944;
- Florida Department of Highway Safety and Motor Vehicles Records, Bates-numbered 0001048064-0001049115;
- Documents Provided by the Colombian Government, Bates-numbered 0001049166-0001049227;
- Documents Recovered from the Defendant's Electronic Devices, Bates-numbered 0001049228-0001049913;
- Intentionally Left Blank, Bates-numbered 0001050324-0001050326; and
- Statements of a Certain Individual, Bates-numbered 0001050327-0001050331.

In addition, pursuant to 18 U.S.C. § 3505, please be advised by this letter that the United States intends to offer at trial foreign records of regularly conducted business activities obtained from Colombia via Mutual Legal Assistance Treaty requests. These records have been provided to you and identified through our various discovery productions, and we will continue to produce additional records that we may introduce at trial pursuant to Section 3505 as we receive them.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
Ryan C. Harris
Hiral D. Mehta
Philip Pilmar
Marietou Diouf
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of Court (BMC) (via ECF) (without enclosures)